

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

DELAWARE COUNTY EMPLOYEES)	Civ. Action No. 2:21-cv-03382-HB
RETIREMENT SYSTEM and BUCKS)	
COUNTY EMPLOYEES' RETIREMENT)	<u>CLASS ACTION</u>
SYSTEM, Individually and on Behalf of All)	
Others Similarly Situated,)	MOTION TO FILE UNDER SEAL
)	
Plaintiffs,)	ELECTRONICALLY FILED
)	
vs.)	
)	
ADAPTHEALTH CORP. f/k/a DFB)	
HEALTHCARE ACQUISITIONS CORP.,)	
LUKE MCGEE, STEPHEN P. GRIGGS,)	
JASON CLEMENS, FRANK J. MULLEN,)	
RICHARD BARASCH, JOSHUA PARNES,)	
ALAN QUASHA, TERENCE CONNORS,)	
DR. SUSAN WEAVER, DALE WOLF,)	
BRADLEY COPPENS, and DAVID S.)	
WILLIAMS III,)	
)	
Defendants.)	
)	
)	

Pursuant to this Court’s Local Rules of Civil Procedure 5.1.2(7) and 5.1.5 and §V of the Stipulation and Protective Order entered by the Court on November 3, 2022 (ECF 82 at 11-13) (the “Protective Order”), lead plaintiffs Delaware County Employees Retirement System and Bucks County Employees’ Retirement System (together, “Lead Plaintiffs”), respectfully move the Court for entry of an order granting this motion and instructing the Clerk of the Court to file under seal their Reply in Further Support of Lead Plaintiffs’ Motion to Certify Class (the “Reply”) and certain exhibits annexed thereto (“Exhibits”) (see below table). Lead Plaintiffs have already filed redacted versions of the Reply and, where possible, certain Exhibits on the public docket.

Lead Plaintiffs make this motion because the Reply refers to information that has been designated as “Confidential” pursuant to the Protective Order. In accordance with the Protective Order’s procedures for filing documents designated as “Confidential” by another party, the parties will meet and confer within seven days of this motion in an effort to narrow or eliminate the materials or information conditionally filed under seal, and within fourteen days, the designating party will file a motion to seal, specifying the materials or information to be sealed and why sealing is appropriate. Protective Order, §V.2.

Lead Plaintiffs take no position on the confidentiality designations at this time.

EXHIBIT	EXHIBIT DESCRIPTION
C	Transcript of the Deposition of Joe Garner, dated February 15, 2023
D	EMERALDADV-00001658 -- January 5, 2021 Email from Nishit Trivedi to Ken Mertz et al. RE: Reasons for Liking the Name
E	Transcript of the Deposition of L. Adel Turki, dated May 2, 2023
F	Expert Reply Report of Matthew D. Cain, PHD, dated May 22, 2023
H	BAIRD-00198854 -- April 13, 2021 Baird Analyst Report titled: AdaptHealth Corp. Downgrading to Neutral with \$35 Price Target
I	BAIRD-00199075 -- Email from Brian Timiss to Sanjiv Talwar RE: McGee charged with tax evasion and securities fraud by Danish Authorities

EXHIBIT	EXHIBIT DESCRIPTION
J	BOAS_00001549 -- Email from Joanna Gajuk to DG TeamFichbeck RE: AdaptHealth to Cut to Neutral at Baird; PT \$35
K	CGAH00007225 -- April 13, 2021 Email from Richard Close to Mark Ferriso RE: McGee's Indictment
L	JEFF00000312 -- April 13, 2021 Email from Jennifer Crosby to Adam Dahms, cc'ing Brian Tanquilit, RE: McGee's Indictment
M	UBS00000271 -- April 13, 2021 emails from Kevin Caliendo RE: UBS First Read: AdaptHealth Corp "CEO Placed on Leave" (Buy) Caliendo
N	Transcript of the Deposition of Craig Lewis, dated May 10, 2023
O	AHCO_00000007 -- July 20, 2021 Email from Jason Clemens to Alex Amis RE: Setting Up a Meeting
P	Exhibits 11 and 12 to the Transcript of the Deposition of Joe Garner, dated February 15, 2023
Q	JEFF00002412 -- January 7, 2021 Email from Lawrence Shurman to Brain Tanquilit et al. RE: for ECM: Accounts with Allocated Shares

DATED: May 22, 2023

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CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on May 22, 2023, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the email addresses on the attached Electronic Mail Notice List, and I hereby certify that I caused the mailing of the foregoing via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

s/ DOUGLAS R. BRITTON

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Manual Notice List

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- (No manual recipients)